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7 *Comenity Capital Bank N.A.*

8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 Marilea Ellis,

12 Plaintiff,

13 vs.

14 Equifax Information Services, LLC;
15 Experian Information Solutions, Inc.;
16 National Consumer Telecom & Utilities
Exchange, Inc.; Comenity Capital Bank
17 N.A.; Petal Card, Inc.; Synchrony
Financial; First Premier Bank dba
Premier Bankcard, LLC; TD Bank USA;
18 and Citigroup Financial Products, Inc.,
19 dba Citibanks CBNA,

20 Defendants.
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CASE NO.: 2:23-cv-00354-CDS-VCF

**JOINT UNOPPOSED MOTION TO
EXTEND DEADLINE FOR
DEFENDANT COMENITY
CAPITAL BANK N.A. TO
RESPOND TO COMPLAINT**

(FIRST REQUEST)

Pursuant to Federal Rule of Civil Procedure 6(b)(1)(A) and Local Rule IA 6-1, Defendant Comenity Capital Bank N.A. (“Comenity”) and Plaintiff Marilea Ellis (“Plaintiff”), by and through their respective counsel, request that the Court grant their Joint Unopposed Motion to Extend the Time for Comenity to answer or otherwise respond to Plaintiff’s Complaint. In support of this Motion, the parties stipulate as follows:

1. The Complaint was served on Comenity on March 14, 2023.

2. Comenity’s current deadline to respond to the Complaint is April 4, 2023.

3. Comenity has diligently worked to find counsel and hired the law firm of Lipson Neilson P.C. on April 4, 2023. This extension is sought in good faith and will allow new counsel time to review the necessary documents and prepare a responsive pleading.

4. The parties met and conferred about the extension of time to respond to the Complaint and agreed that Comenity’s deadline to respond to the Complaint may be extended to May 3, 2023.

5. There have been no prior extensions of Comenity’s deadline to respond to the Complaint.

6. Accordingly, the parties respectfully and jointly request that the Court extend the deadline for Comenity to answer or otherwise respond to the Complaint to May 3, 2023.

DATED: April 4, 2023

LIPSON NEILSON P.C.

By: /s/ Janeen V. Isaacson

Joseph P. Garin

Janeen V. Isaacson

Attorneys for Defendant

Comenity Capital Bank N.A.

1 DATED: April 4, 2023

FREEDOM LAW FIRM, LLC

2 By: /s/ Gerardo Avalos (w/permission)

3 Gerardo Avalos

4 8985 South Eastern Avenue, Suite 100

5 Las Vegas, NV 89123

6 *Attorney for Plaintiff Marilea Ellis*

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8 **ORDER**

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10 IT IS SO ORDERED.

11 

12 United States Magistrate Judge

13 Dated: 4-6-2023

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 4th day of April, 2023, service of the foregoing **JOINT UNOPPOSED MOTION TO EXTEND DEADLINE FOR DEFENDANT COMENITY CAPITAL BANK N.A. TO RESPOND TO COMPLAINT (FIRST REQUEST)** was made upon each party in the case who is registered as an electronic case filing user pursuant to Fed. Rule Civ. P. 5(b)(3), and Local Rule 5-4, as follows:

George Haines, Esq. Gerardo Avalos, Esq. FREEDOM LAW FIRM, LLC 8985 South Eastern Ave., Suite 350 Las Vegas, NV 89123 info@freedomlegalteam.com <i>Attorneys for Plaintiff Marilea Ellis</i>	Gia Marina, Esq. CLARK HILL PLC 1700 South Pavilion Center Drive Suite 500 Las Vegas, NV 89135 gmarina@clarkhill.com <i>Attorneys for Equifax Information Services, LLC; Experian Information Solutions, Inc.; and National Consumer Telecom & Utilities Exchange, Inc.</i>
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/s/ Michele Stones
An Employee of LIPSON NEILSON P.C.